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W. M. Greenwald

August 7, 2019

*Via* ECF Filing,  
and First Class Mail

Hon. Michael E. Wiles  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004

Re: ***In re Boaz Bagbag, Debtor***  
**Chapter 7, Case No. 08-12667-MEW**  
**and**  
***Bagbag v Summa Capital Corp.,***  
**Adv No. 19-01022-MEW**

Dear Judge Wiles:

This firm represents Summa Capital Corp. ("Summa"), in this case.

In compliance with Your Honor's August 1, 2019, order in this action, Summa asks that this Court leave open this adversary proceeding and the Debtor's case.

Summa intends to seek sanctions against the Debtor and his counsel. The decision denying the Debtor's motion/action shows that the Debtor's pleadings were not supported by law or fact. The action's record shows the Debtor and his counsel vexatiously multiplied the proceedings. Legitimate bases for seeking sanctions exist.

We ask for the Debtor's case to remain open to facilitate enforcement proceedings. This Court has jurisdiction to enforce Summa's consent judgment against the Debtor, issued by this Court.

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We are available for any questions the Court has in this regard.

Thank you for your consideration.

Respectfully,

/s/ Wayne M. Greenwald

Wayne M. Greenwald

WMG/ms

cc: Adam Pollock, Esq.